

October 21, 2011

Via Electronic Submission

Ms. Marlene H. Dortch, Secretary Federal Communications Commission 445 12th St., SW, Room TW-A325 Washington, DC 20554

Re: Ex Parte Communication

WC Docket Nos. 10-90, 07-135, 05-337, 03-109; CC Docket Nos. 01-92, 96-45;

and GN Docket No. 09-51

Dear Ms. Dortch:

Yesterday, Charles McKee, Michael Fingerhut, Chris Frentrup and I, all of Sprint Nextel Corp., met with Albert Lewis, Doug Slotten, and Ted Burmeister to discuss intercarrier compensation.

On the subject of traffic pumping, Sprint urged the Commission to adopt strict measures to eliminate or minimize traffic pumping schemes. Specifically, Sprint urged the Commission to adopt the proposals contained in Sprint's Comments and Reply comments in this proceeding as well as in numerous ex parte meetings with Commission staff. These measures include:

- declaring that revenue sharing (both inter-carrier and intra-company) is an unlawful practice; *see* Sprint's April 1, 2011 Comments at 12 (the deleterious and well-documented effects of "improper revenue sharing agreements" are "obviously contrary to the public interest.");
- affirming previous FCC decisions which found that calls for which there was no terminating end user do not constitute access traffic and thus are not subject to access charges; see Sprint's April 1, 2011 Comments at 9-12;
- clarifying that pumped calls which are not access traffic may not be assessed access charges by any LEC at the terminating end (either a tandem service provider or the terminating LEC); see Sprint's April 1 Comments at 17; and
- declaring that, to the extent that a LEC is allowed to assess a charge for pumped traffic, such rate must be set at the lowest intercarrier compensation rate charged by an ILEC in the state; *see* Sprint's April 1 Comments at 13-19 (urging the adoption of the current reciprocal compensation rate of \$.0007 once the 3:1 trigger is met).¹

¹ In its April 1 Comments (at 20-21), Sprint recommended that CLECs engaged in traffic pumping be subject to mandatory detariffing. In fact, the Commission has already proposed to "to establish complete detariffing for all non-ILEC providers of interstate access services." *Hyperion Telecommunications, Inc. Notice of Proposed Rulemaking*, 12 FCC Rcd 8596 (1997); *Commission Asks the Parties to Update and Refresh the Record on Mandatory Detariffing of CLEC Interstate Access Services, Public Notice*, 15 FCC Rcd 10181 (2000). Plainly, the public interest would be served if the Commission were to adopt its proposal in the *Hyperion* rulemaking and thereby prevent tariff pumping CLECs from exploiting the tariff filing process to engage in uneconomic arbitrage.

Ms. Marlene H. Dortch, Secretary October 21, 2011 Page 2

Sprint also distributed screen shots from Internet sites advertising various traffic pumping schemes. A copy of that presentation is attached.

Consistent with its filings in the above-captioned proceedings, Sprint also urged the Commission (1) to adopt high-level rules to require incumbent LECs and their affiliates that offer retail broadband voice services to negotiate IP voice interconnection agreements in good faith, and (2) to reject proposals to assess access charges on VoIP services, or, if such a rule were adopted, to make clear that the new rule would be prospective only.²

Pursuant to Section 1.1206 of the Commission's Rules, a copy of this letter is being filed electronically in the above-referenced dockets. If you have any questions, please feel free to contact me at (703) 433-4503.

Sincerely,

/s/ Norina T. Moy

Norina T. Moy Director, Government Affairs

C: Albert Lewis
Doug Slotten
Ted Burmeister

² See, e.g., Sprint comments dated August 24, 2011.

"The Ranch"

educational purposes. It is already listed as a Non-Profit organization, and is in the process of retreiving the listing of a 501-c3.

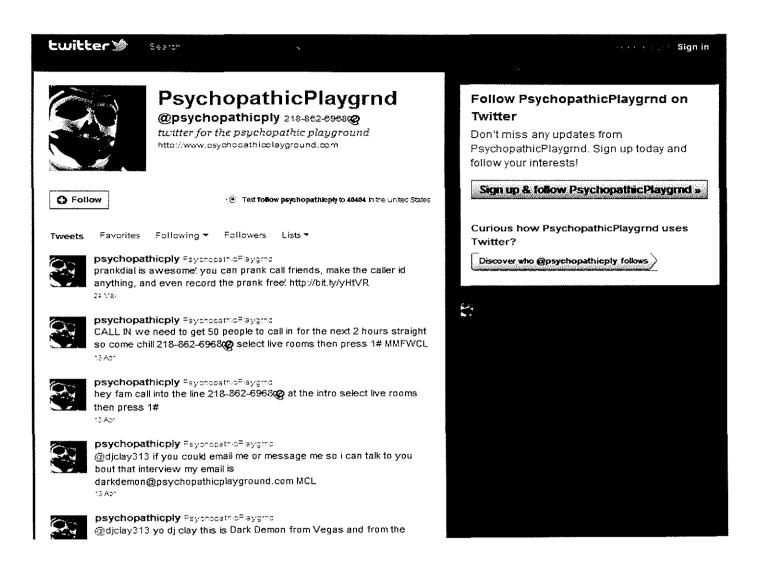
This chatline will help get blind peak to its final goal by raising money through the phone company that hosts it. When you call in it is a free call as long as you have unlimited long distance calling on your cell phone. You can call in, mute your phone and let it sit there and still will not be charged anything. By doing this you have chosen to donate to Blind Peak Just a Little Horse Ranch, and it doesn't even come up out of YOUR pocket. Plus its a great way to socialize and meet awesome new people. The funds collected through your call, which is free, are used to pay for the grooming, training, and maintaining of the horses and building of the ranch.:)

There are 100 extentions that we call rooms on this chat line, each room can hold up to 99 callers. Once you become a regular caller, the owner of the line, me, T\hunderbird, may assign your own room to host! Furthermore, the hosts are given a code to monitor the ambience in the rooms assigned to them, so if it is your first time to the rooms please listen to the door greeting because the topics and its laxsticity will be solely governed by the room owners.

The best part of this chat line, besides the people on here, is that the callers and room owners may be blind or sighted. Please call in and be part of our wonderful community or host a room where all your friends can meet. This line hosts the United States and Canada, and is completely free to unlimited long distance callers, you must be 18 years of age to call. you can call one of two chatlines the peak where you can see all at 218 936 1419, thunderbird is in room 1#, or alices restaurant where you can get anything you want except for alice at 218-862-6990 thunderbird is in room 0#. this is a free call as long as you have unlimited long distance on your cell phone. you may ask shelly or

http://blindpeak.webs.com/thechatline.htm





http://http://twitter.com/#!/psychopathicply



Partylines UncensoredPartyLines.Com

Main W

Web Control

Features

System Information

24/7 Conferencing

Free Party Lines

Contact

All of our party lines are 100% free to call 24 hours a day, 7 days a week

rmal telephone toll charges go apply

If the party line you are interested in has its own website you will be able to view it. Just put your mouse over the name and if it turns red that means you can click on it to visit their site. Be sure to visit any website available. They could be more up to date, and list other important information that you might want to know before joining their system. We have hundreds of party lines available. If you would like to run your own party line, contact us and let us know how we can help you get started.

THA BAD A55 CLUB - 218-862-1834

Welcome to THA BAD ASS CLUB where YOU CAN BE BADASS ALL YOU WANT with your line owner Crazy Mike. We are a totally free, relaxed, down to earth party line. We have 100 rooms. We have shout cast radio streams of all kinds so check it out let us know what ya think. We don't discriminate. We have all kinds of games like truth or dare, dirty minds, karaoke ladies and guy's auctions hot seat and much more. We are always looking for new room owners. Only rule we have is you must be at least 18 yrs or older other than that I don't care what the heck ya do. Questions or comments complaints call my costumer service @ 773-572-7794%.

Heaven and Hell - 218-862-2390 🛠

Welcome to Heaven and Hell where no matter what you've done, if you've been blocked system wided or anything else your welcome here and treated like family. There are rooms available to own and run your own way. So come and check us out and enjoy karaoke night and so much more. You must be 18 or older and keep drama minimal. If interested ask for the line owner Veronica, moderators Jose, or CJ. Hope to hear from you soon.

The Asylum - 218-862-2391

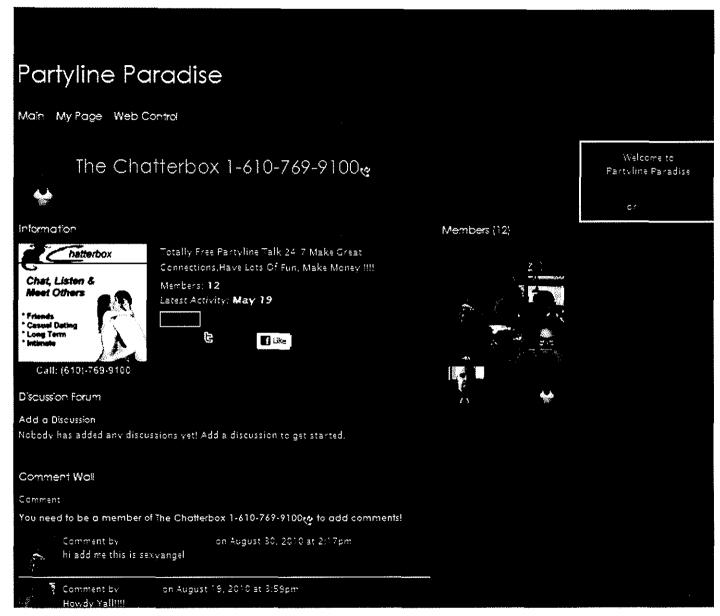
Welcome to the Asylum, where once inside, there's no escape. The owner of this system is the infamous Bobby from Kentucky. The atmosphere is cool, laid back, and mildly entertaining. If you are interested, you can own a room of your own, I don't discriminate, I welcome all people. However, this is an open party line where opinions vary and freedom of speech and expression is completely unrestricted. There are practically no rules: this line can be described as a version of uncensored minus the unnecessary noises such as blaring music, blowing into the phone, etc. If you need to contact me, you can call and leave a message on the laser box at: (206) 222-7838t, or just find me in room 1 online. In addition, you can find us on Face book by searching Asylum party line or click the link above. Just remember, we're not your psychiatrists, so don't get your feelings hurt.

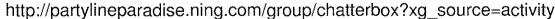
Jokers Play House - 218-862-3200 1

This chat line is a laid back, drama free party line, and the party is always happening with lots of males and females. There are 4 simple rules: Rule #1. You have to be 18 or older to join. Rule #2. No putting people

http://uncensoredpartylines.com/freepartylines.html (Link has 8 pages of ads/lines)









Area 51 Chat



MucHa Fhotogeniik

hola linda nobre

February 19 at 4:27pm - Like - Comment



Luis YLuli

February 17 at 10:28am + Eke + Comment



AREA - 51 CHAT GRATIS

FUIMOS.SOMOS Y SEGUIREMOS SIENDO LOS#1GUSTE A QUIEN NO LE GUSTE SEGUIRAN HABRANDO MIERDA DE NOSOTROS ETC.PERO NOSOTROS NO PELIAMOS DEMOSTRAMOS Q SOMOS LOS PRIMERO NO SE TRATA DE COMBO NI DE CORILLO ESTO SE TRATA DE CALIDAD ASI QUE CUANDO PUEDAN ALCANZAR LA CUALIDAD QUE NOSOTROS TENEMOS ENTONCES HABRAMOS, MIENTRAS TANTO SIGAN DANDONOS FAMA ACUERDENSEN NOSOTROS NO HACEMOS PAUTA NOSOTROS SOMOS LA FUCKING PAUTA AREA 51

February 21 at 5:30pm + like + Comment

∠¹ Lunna Tavarez and MucHa Fhotogeniik like this.



AREA - S1 CHAT GRATIS VENGAN YA AL MEJOR CHAT "AREA 51" TELEFONO A LLAMAR TOTALMENTE GRATIS 218 862 5151 O EL NUEVO DESVIO EN PUERTO RICO 787 671 6689 CON TAMBIEN SU NUEVA PAGINA DE TINY CHAT ES WWW.tinychat.com/area51 VENGAN Y diviertanse February 21 at 5:36pm



AREA - 51 CHAT GRATIS

VENGAN YA AL MEJOR CHAT "AREA 51" TELEFONO A LLAMAR TOTALMENTE GRATIS 218 862 5151 O EL NUEVO DESVIO EN PUERTO RICO 787 671 6689 CON TAMBIEN SU NUEVA PAGINA DE TINY CHAT ES www.tinychat.com/area51 VENGAN Y diviertanse



AREA 51 - Tinychat thrychat.com

[b]Area 51 chatsaiudos miligente los invito a AREA 51 el chatiine del momento ilama al 218-862-5151@ o si estas en puerto rico ilama al 787-671-6659@ completamente gratis y

divertido l'amen runka saben a kienpodran conocerti [size=200]]/size]

February 11 at 12:16pm : Like : Comment

http://www.facebook.com/pages/AREA-51-CHAT-GRATIS/137732209592310



Go Premium 4 Sign In

blogtalkradio-

On Air - Featured - Popular - Stations

search ologialkradic.com

Create My Talk Show

Brow If you like this show, you can follow BORI CONEXION LATINA.

ss, Finance, Fitness, Technology, Sports, See Alt



CONEXION LATINA RADIO SHOW

by BORI CONEXION LATINA

in Radio

Fri, May 13, 2011



Today's Picks



3D TV Glasses for \$84.95

saludos mi gente los invito a
CONEXION LATINA el chatline del
momento llama al 218 862 1820 o si
estas en puerto rico llama al 787 586
0798 marca 5# para explicaciones
completamente gratis y con mucho
respeto divertido llamen nunca
saben a quien podran conoce

See to your section piece:

Cost to real Cost and window

Tags: RADIO TALK SEX CHAT MUSIC

ON AIR NOW

The Now Network

Top Shows

http://www.blogtalkradio.com/bori-conexion-latina/2011/05/13/conexion-latina-radio-show

BulletProof Vests



http://www.myspace.com/557461000/photos/2059020#%7B%22ImageId%22%3A2059020%7D

salas de chat disponibles 787-431-7775/218-862-515

DOMINGO 28 DE NOVIEMBRE DE 2010 SEGUIDORES O Sequir zona Urbana Google Friend Connect : Committee of the control of the co Todavia no hay seguidores. ;Sé el primero! spales flamen a les números ye dilities y acordesen que sonisten queden socer erreposition y complete material general material gapte to their executions of the execution of the complete conuereo los emperos por la sede subteches graces a terrabilin se planter comunicar con Ale 47 a Silano, busquerimen en montadio 27 biospolució ¿Ya eres miembro? Appeder Publicado por agreishaliz en 16:36 MD C. 🗗 🗭 ARCHIVO DEL BLOG **▼** 2010 (1) ▼ noviembre (1) 0 comentarios: zona Grosna Publicar un comentario en la entrada **DATOS PERSONALES** agreishaliz Ver todo mi perfil

http://montadora27.blogspot.com/2010/11/zona-urbana.html



Linked



agreishaliz diaz

agreishaliz en salas de chat

Jamestown y alrededores, Nueva York | Consultoría de estrategia y operaciones

Current	hablar por telefono at salas de chat agreishaliz at salas de chat
Education	• universidad de puerto rico
Connections	0 connections

agreishaliz diaz's Summary

salas de chat

Specialties

hablar por telefono, hacer salas de chat, bregar por la computadora

agreishaliz diaz's Experience

hablar por telefono

salas de chat

Septor de Consultoría de estrategia y oceraciones Actualmente tiene este puesto de trabajo

agreishaliz

salas de chat

Septor de Consultoria de estrategia y oceraciones junio de 2010 -- Presente (1 año 1 mes)

787-431-7775/218-862-5159

agreishaliz diaz's Education

http://www.linkedin.com/pub/agreishaliz-diaz/27/B2A/731

Get full acc	cess to agreishaliz diaz's	profile
	nember, you'll join 100 million profes anections, ideas, and opportunities	
First Name:		
Last Name:		
Email:		
Password:		
	Join Now!	
500 AT \$450 500 1 \$2000 500 700 700 100 100 100 100 100 100 100 1	Aready on LinkedIn? Sign in.	
Name Sear	rch:	

Search for people you know from over 100 million professionals already on Linkedin.

First Name

Last Name

Q

Example: Jeff Weiner



	Chitown //www.fa		
face	110	ok	,

Email	Passwo	ord			
				Log In	
<u></u>	 				

Facebook helps you connect and share with the people in your life.



Wall

III Info

Photos Notes

#1 Friends

Friends

Cady Erazo



Mami Roxy Ramos



Beba Linda



Lissette Rivera



Mostro Verde

Bori Chitown 4 Add as Friend

Activities and Interests

Activities



Statue of Liberty



Mi genteeee CONEXION LATINA el chatline del momento llama al 218-862-2361 o si estas en puerto rico llama al 787-469-2826@ marca 5 paraexplicaciones completamente gratis

v divertido llamen nunka saben a kienpodran conocer

Other

FriendCameo, PA LOS HONDEROS, PA LOS TOYOTEROS, Como hacer una conversación de 2 o más personas en el chat de facebook... Soy Insoportable, Tarjetitas, BORICUAZO, CineTux, Green Dot, FOX Chicago Weather, Willis Tower, causes.com, chapaface.com, Battlefield, ESPN and 46 more

Arts and Entertainment

Music



Plan 8



Randy



Gringo







Bori Chitown is on Facebook.

To connect with Chitown, sign up for Facebook today.

₩ Send Message

Sign Up

it's free and anyone can join. Afready a member? Log in.

Wrong Chitown?

Try again: Bori Chitown Search

http://www.facebook.com/cbori

Movies

